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CLERK U.S. DISTRICT COURT
CENTRAL DIST. OF CALIF.
LOS ANGELES

UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

February 2018 Grand Jury

UNITED STATES OF AMERICA,

Plaintiff,

v.

ROBIN DIMAGGIO,

Defendant.

CR No. 18-

18CR00891-DMG

I N D I C T M E N T

[18 U.S.C. § 1343: Wire Fraud; 18 U.S.C. § 1957: Engaging in Monetary Transactions in Property Derived from Specified Unlawful Activity; 18 U.S.C. § 2(b): Causing an Act to be Done]

The Grand Jury charges:

COUNT ONE

[18 U.S.C. § 1343]

A. INTRODUCTORY ALLEGATIONS

1. At all times relevant to this Indictment, defendant ROBIN DIMAGGIO ("DIMAGGIO") controlled DiMaggio International, Inc. ("DMI"), an entity incorporated by defendant DIMAGGIO in California.

2. At all times relevant to this Indictment, defendant DIMAGGIO exercised control over and had access to the following bank accounts:

a. Citibank bank account ending in 5621 in the name of DMI International ("DMI Account"); and

1 b. Citibank bank account ending in 2498 in the name of
2 DIMAGGIO ("DIMAGGIO Account").

3 3. At all times relevant to this Indictment, The Peace For Me
4 Peace For You Foundation (the "Foundation") was a charity in Bulgaria
5 that was attempting to organize a charity concert (the "charity
6 concert") to raise money for and awareness of homeless and displaced
7 children from conflict zones worldwide.

8 4. At all times relevant to this Indictment, K.D. was the
9 financial sponsor of the charity concert.

10 B. THE SCHEME TO DEFRAUD

11 5. Beginning no later than in or about May 2016 and continuing
12 to on or about December 7, 2018, in Los Angeles County, within the
13 Central District of California, and elsewhere, defendant DIMAGGIO,
14 knowingly and with intent to defraud, devised, participated in, and
15 executed a scheme to defraud K.D. as to material matters in
16 connection with the organization of the charity concert, and to
17 obtain money and property from K.D. by means of material false and
18 fraudulent pretenses, representations, and promises, and concealment
19 of material facts.

20 C. THE MANNER AND MEANS OF THE SCHEME TO DEFRAUD

21 6. The scheme to defraud operated, in substance, in the
22 following manner:

23 a. Through oral statements and written materials,
24 defendant DIMAGGIO falsely represented that he could obtain well-
25 known artists to perform at the charity concert.

26 b. To obtain K.D.'s funds, defendant DIMAGGIO made
27 representations that were false and concealed material facts,
28 including representations: that specific performers had agreed to

1 participate in the charity concerts; that the funds would be used to
2 pay the performers; and that the funds would be kept in an escrow
3 account until the parties had agreed as to which performers should be
4 hired. In truth and in fact, as defendant DIMAGGIO then well knew,
5 the representations were false and concealed material facts because,
6 among other things: the performers were not booked and had not agreed
7 to perform at the charity concert; the funds would not be used to pay
8 the performers; and the funds would not be kept in an escrow account.
9 Instead, defendant DIMAGGIO would use the funds to pay his personal
10 expenses, including a settlement with his ex-wife through the
11 purchase of a residence for her.

12 c. In reliance on defendant DIMAGGIO's false
13 representations, K.D. caused the funds to be transferred to defendant
14 DIMAGGIO by wire to the DMI Account.

15 d. In order to further conceal his scheme, defendant
16 DIMAGGIO lied during a deposition taken in the course of litigation,
17 fabricated bank documents, and deleted documents related to his
18 dealings with the Foundation.

19 D. THE USE OF THE WIRES

20 7. On or about August 5, 2016, in Los Angeles County, within
21 the Central District of California, and elsewhere, defendant
22 DIMAGGIO, for the purpose of executing the above-described scheme to
23 defraud, transmitted and caused the transmission of a wire
24 communication in interstate and foreign commerce, namely, the
25 transfer of approximately \$750,000 from a bank account in Bulgaria
26 controlled by K.D. to the DMI Account, in Westlake Village,
27 California.

COUNT TWO

[18 U.S.C. §§ 1957, 2(b)]

8. The Grand Jury hereby incorporates by reference and re-alleges paragraphs 1, 2, and 6 of this Indictment, as though fully set forth herein.

9. On or about August 22, 2016, in Los Angeles County, within the Central District of California, and elsewhere, defendant ROBIN DIMAGGIO ("DIMAGGIO"), knowing that the funds involved represented the proceeds of some form of unlawful activity, knowingly engaged and willfully caused others to engage in a monetary transaction, affecting interstate commerce, in criminally-derived property of a value greater than \$10,000, by transferring approximately \$251,370 from the DIMAGGIO Account to Santa Clarita Valley Escrow, for the purchase of a residence in Calabasas, California, such property, in

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fact, having been derived from a specified unlawful activity, namely,
wire fraud, in violation of Title 18, United States Code, Section
1343.

A TRUE BILL

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Foreperson

NICOLA T. HANNA
United States Attorney



LAWRENCE S. MIDDLETON
Assistant United States Attorney
Chief, Criminal Division

RANEE A. KATZENSTEIN
Assistant United States Attorney
Chief, Major Frauds Section

MONICA E. TAIT
Assistant United States Attorney
Deputy Chief, Major Frauds Section

POONAM G. KUMAR
Assistant United States Attorney
Major Frauds Section